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August 29, 2018 1:26 PM

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

Keturah Mixon,

Plaintiff in Pro Per,

Case No. 1:18-cv-499
Honorable Janet T. Neff

Vs.

David Trott, Trott Law P.C. (f/k/a Trott and Trott P.C.)
Carrington Mortgage Services LLC,
(a/k/a Carrington Mortgage Holdings LLC),
Bank of America Corporation,
(a/k/a Bank of America N.A.)

Defendants.

Keturah Mixon
243 Devon Road
Battle Creek Mi. 49015
(269) 339-9337
Plaintiff in Pro Per

Thomas G. Costello (P42973)
David G. Michael (P68508)
Attorneys for Defendant Carrington
Lipson Neilson P.C.
3910 Telegraph Road, Suite 200
Bloomfield Hills, Michigan 48302
(248) 593-5000

Amy Sabbota Gotlieb (P67020)
Aimee R. Gibbs (P70522)
Dickinson Wright Pllc
Attorneys for Bank of America, N.A.
2600 Big Beaver Road, Ste. 300
Troy MI. 48084-3312
(248) 443-7286

Thomas W. Cranmer (P25252)
Matthew P. Allen (P57914)
Miller, Canfield, Paddock and Stone, P.L.C.
Attorney for David Trott
Troy, Michigan 48098-6358
(248) 267-3381

Richard Welke (P44403)
Jeffrey R. Raff (P55761)
Attorneys for Trott Law P.C.
31440 Northwestern Hwy., Ste. 200
Farmington Hills, MI 48334-5422
(248) 723-5765

**PLAINTIFF KETURAH MIXON'S MOTION TO DISQUALIFY
OPPOSING COUNSEL AND THEIR RESPECTIVE LAW FIRMS BASED
ON VIOLATIONS OF THE ABA MODEL RULES OF PROFESSIONAL
CONDUCT, ABA CODE OF PROFESSIONAL RESPONSIBILITY,
FRAUD, FRAUDULENT MISREPRESENTATIONS, AND FRAUD UPON
THE COURTS AND MEMORANDUM OF LAW IN SUPPORT**

Plaintiff Keturah Mixon moves this Court for entry of an Order disqualifying Aimee Gibbs, Amy Gottlieb, Thomas Costello, David Michael, Jeffrey Raff, Richard Welke and the Law firms of Dickinson Wright PLLC, Lipson Neilson P.C. and Trott Law P.C for violations of the ABA Model Rules of Professional Conduct, ABA Code of Professional Responsibility, Fraud, and Fraud upon the Courts. Throughout the course of this litigation, All Defendant Counsel and their respective law firms' have filed false, fraudulent, forged, and void evidence, have made material fraudulent misrepresentations, have introduced evidence and made material misstatements that are not based upon their personal knowledge, have committed fraud upon the courts and have misled the courts. Without any evidentiary basis whatsoever, all defendants' counsel and their respective law firms have been defending this case knowing that there is no law that supports their purported defenses. Those filings were, intentionally calculated and made in bad faith for the purpose of harassing, embarrassing and disparaging Plaintiff. In all of Defendant Counsels' fraudulent submissions, they have disrupted these proceedings and failed to fulfill their duties as officers of the court. Moreover, even if defendants' counsel and their respective law firms' actions did not threaten the orderly administration of justice, which they did, disqualification would be appropriate in these circumstances, given that their actions violated several of The Rules of Professional Conduct. For all of the reasons stated in this motion, memorandum of law in support of this motion and for all of the reasons already stated in the record, Plaintiff hereby

moves this Honorable Court to disqualify All defendant counsel and their respective law firms from representation in this lawsuit.

Dated: August 26, 2018

Respectfully Submitted,

Keturah Mixon

Keturah Mixon
Plaintiff in Pro Per
243 Devon Road Battle Creek MI, 49015
(269)339-9337

CERTIFICATE OF SERVICE AND CONFERENCE

Plaintiff hereby certifies that she conferred with defendants to see if this motion would be opposed, mailed a true and complete copy of the foregoing document along with The memorandum of Law is in Support of, certificate of conference along with the certificate of service, in The U.S. Mail on August 26th, 2018.

Dated: August 26th, 2018

Respectfully submitted,

Keturah Mixon

Keturah Mixon
Plaintiff in Pro Per
243 Devon Road Battle Creek MI, 49015
(269)339-9337
keturahmixon@yahoo.com

Keturah Mixon
243 Devon Road
Battle Creek MI. 49015

United States District Court
Western District of Michigan
107 Federal Bldg.
410 W. Michigan Ave.
Kalamazoo MI. 49007

